

EXHIBIT 81

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Norman Broderick. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Cobb County in Georgia and my residence address is [REDACTED] Powder Springs, GA 30127.
3. I am retired military. I was in the military for 24 years and I have voted absentee before, while being stationed overseas.
4. For the 2018 Georgia General Election, I could not exercise my right to vote due to unacceptable errors from elections officials.
5. I tried to vote absentee. I filled out all of my forms correctly, and I sent them in on time. But my ballot arrived at the wrong address, and elections officials would not resolve the situation.
 - a. I work at the Shaw Air Force Base in Sumter, SC, so I knew I needed to vote absentee this election cycle. I submitted an application for an absentee ballot well in advance of the election.
 - b. I went to the Cobb County Elections website. I designated my residential address as one in Georgia and my mailing address as one in South Carolina to ensure that the ballot was sent to me.
 - c. I typed the form myself to ensure there were no mistakes. I emailed it in per the website instructions.

- d. Later, my wife checked the mail at our home in Georgia and informed me that my ballot had arrived at my address in Georgia, instead of my address in South Carolina.
- e. I clearly indicated that the ballot needed to be sent to South Carolina.
- f. At that point, I knew that I did not have time to return to Georgia to vote before Election Day, and I hoped to find a resolution for the issue with the Cobb County Board of Elections.
- g. I emailed the Cobb County officials to let them know I was disappointed with the process and that I wanted to file a grievance. I then visited the Cobb County Board of Elections website to file a grievance detailing my issue.
- h. On the Saturday after the election, November 10, I received a call back.
- i. An elections official informed me that they indeed made a mistake with my ballot and that, unfortunately, I would not be able to vote this cycle.
- j. She acknowledged that the elections officials had failed on their end. They committed an error by mailing my ballot to the incorrect location.

- k. She stated that after they receive the absentee ballot application, the ballot issuance process involves three separate people who verify that the information is correct.
 - l. Through three stages of the process, all three people, tasked with verifying the correct information, failed to ensure that my absentee ballot would be sent to the proper address.
 - m. The elections official informed me that a resolution would not be possible and that my ballot would not be counted.
 - n. I have copies of my application to vote absentee and the chain of email correspondence with the Cobb County Board of Elections.
 - o. As someone who served for decades in our military, the fact that my absentee ballot was mishandled by elections officials is unacceptable.
 - p. I did everything I needed to do to vote on my end, only to watch as my right to vote was taken away from me this election cycle.
6. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
7. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
8. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 6 day of December, 2018.


Norman Broderick